

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

MARK I. SOKOLOW, et al.

Plaintiffs,

v.

Civ. No. 04-00397-GBD

THE PALESTINE LIBERATION ORGANIZATION, et al.,

Defendants.

DECLARATION OF DAVID J. STRACHMAN

I, David J. Strachman, declare pursuant to 28 U.S.C. § 1746, as follows:

1. I am counsel for the plaintiffs in the above-captioned case.
2. I was counsel for the plaintiffs in *Ungar v. Palestinian Authority*, Civ. No. 00-105L (D.R.I.). Attached hereto as Exhibit 1 are all the documents evidencing the jurisdictional contacts of the PA and PLO that were submitted to the Ungar court and relied upon and referred to in *Ungar v. Palestinian Authority*, 325 F.Supp. 2d 15 (D.R.I. 2004).
3. Exhibits C, D and E to Plaintiffs' Memorandum in Opposition to Defendants' Renewed Motion to Dismiss Pursuant to Fed.R.Civ.P. 12(b)(2) ("Plaintiffs' Memo"), respectively, are copies of Hassan Abdel Rahman's business card identifying him as "Chief Representative" to the "Palestine Liberation Organization" and the "Palestine National Authority", a letter written by Hassan Abdel Rahman to Congressman Abercrombie in which he identifies himself as "Chief Representative of the PLO and PNA", and a letter sent to Hassan Abdel Rahman by Richard C. Massey of the United States Department of State identifying him as "Chief Representative PLO & PNA".

4. Exhibit F to Plaintiffs' Memo is a copy of a contract between the PA and Bannerman Associates.

5. Exhibits G-L to Plaintiffs' Memo are copies of the relevant FARA reports Bannerman & Associates filed with the Department of Justice.

6. During the six-month period ending in September 1998, defendants' D.C. office received \$226,936.674 from the PA's Ministry of Finance, spent \$141,498.78 and engaged in 14 interviews, speeches and other public events, only two of which could be considered "government contacts." Exhibit 2.

7. During the six-month period ending in March 1999, defendants' D.C. office received \$142,319.66 from the PA's Ministry of Finance, spent \$199,247.66 and engaged in 13 interviews, speeches and other public events, only three of which could be considered "government contacts." Exhibit 3.

8. During the six-month period ending in September 1999, defendants' D.C. office received \$352,894.79 from the PA's Ministry of Finance, spent \$263,824.53 and engaged in 20 interviews, speeches and other public events, only one of which could be considered a "government contact." Exhibit 4.

9. During the six-month period ending in March 2000, defendants' D.C. office received \$125,838.84 from the PA's Ministry of Finance, spent \$215,846.53 and engaged in 15 interviews, speeches and other public events, only four or possibly five of which could be considered "government contacts." Exhibit 5.

10. During the six-month period ending in September 2000, defendants' D.C. office received \$384,238.47 from the PA's Ministry of Finance, spent \$300,698.66 and engaged in 19

interviews, speeches and other public events, none of which could be considered a “government contact.” Exhibit 6.

11. During the six-month period ending in March 2001, defendants’ D.C. office received \$169,026.93 from the PA’s Ministry of Finance, spent \$250,816.95 and engaged in 27 interviews, speeches and other public events, only two of which could be considered “government contacts.” Exhibit 7.

12. During the six-month period ending in September 2001, defendants’ D.C. office received \$211,381.60 from the PA’s Ministry of Finance, spent \$214,502.83 and engaged in 18 interviews, speeches and other public events, only two of which could be considered “government contacts.” Exhibit 8.

13. For the six-month period ending in March 2002, defendants’ D.C. office failed to report its income, expenditures or activities because its papers were in storage. Exhibit 9.

14. During the six-month period ending in September 2002, defendants’ D.C. office received \$201,655.91 from the PA’s Ministry of Finance, spent \$92,237.66 and engaged in 23 interviews, speeches and other public events, only two of which could be considered “government contacts.” Exhibit 10.

15. During the six-month period ending in March 2003, defendants’ D.C. office received \$431,828.50 from the PA’s Ministry of Finance, spent \$296,128.60 and engaged in 10 interviews, speeches and other public events, only one of which could (possibly) be considered a “government contact.” Exhibit 11.

16. During the six-month period ending in September 2003, defendants’ D.C. office received \$417,994.52 from the PA’s Ministry of Finance, spent \$418,666.34 and engaged in 21

interviews, speeches and other public events, only five or six of which could be considered “government contacts.” Exhibit 12.

17. Exhibit K to Plaintiffs’ Memo is a Nexis database transcript of a hearing before the Labor, Health and Human Services, Education and Related Agencies Subcommittee of the Senate Appropriations Committee on October 30, 2003.

18. A search of the Nexis database shows that between January 1998-January 2004 Hassan Abdel Rahman appeared in the following 158 broadcasts, reports and public events:

<u>Date</u>	<u>Event</u>
October 15, 2003	CNN “Paula Zahn Now” interview
September 13, 2003	CNN “Morning News” interview
September 12, 2003	Fox News Channel “Fox News Live” interview
June 14, 2003	Fox News Channel “Fox & Friends Saturday” interview
June 11, 2003	Fox News Channel “On the Record with Greta Van Susteren” interview
June 11, 2003	Fox News Channel “On the Record with Greta Van Susteren” interview
June 2, 2003	Syndicated Radio “Diane Rehm Show” interview
June 2, 2003	Spoke at a meeting of the City Club of Cleveland
March 5, 2003	“MSNBC Countdown: Iraq” guest appearance
May 30, 2003	CNN “Live from the Headlines” interview
May 26, 2003	MSNBC “Buchanan & Press” interview
May 26, 2003	ABC “World News this Morning” interview
May 26, 2003	CNN “Headline News” interview
May 25, 2003	ABC “This Week” guest appearance
May 20, 2003	Fox News Channel “Fox News Live” interview
May 19, 2003	CNBC “Sp. Report with Maria Bartiromo” interview
May 18, 2003	Fox “At Large with Geraldo Rivera” interview
March 5, 2003	MSNBC “Countdown: Iraq” guest appearance
February 27, 2003	CNBC “News with Brian Williams” guest appearance
December 17, 2002	Fox News Channel “Fox News Live” interview
November 27, 2002	CNN “Insight” interview
October 5, 2002	CNN “CNN Saturday Night” interview
September 23, 2002	MSNBC “Buchanan & Press” interview
September 22, 2002	CNN “Sunday Morning” interview
September 19, 2002	Fox News Channel “On The Record with Greta Van Susteren” interview
July 23, 2002	Fox News Channel “Fox News Live” interview
July 14, 2002	Associated Press interview from Washington, D.C.

June 27, 2002	CNBC "Early Today" guest appearance
June 26, 2002	NBC "Nightly News" guest appearance
June 25, 2002	Fox "News Live" interview
June 24, 2002	NPR "All Things Considered" interview
June 24, 2002	CNN "Crossfire" guest appearance
June 24, 2002	CNN "Insight" guest appearance
June 18, 2002	Fox News Channel "Hannity & Colmes" guest appearance
June 18, 2002	MSNBC "America At War" guest appearance
June 12, 2002	Meeting with Editors of the <i>Washington Times</i> in Washington D.C. to discuss PLO matters
June 5, 2002	Fox News Channel "Fox News Live" interview
June 5, 2002	CNN "Newsnight Aaron Brown" interview
May 23, 2002	MSNBC "Hardball with Chris Matthews" guest appearance
May 20, 2002	Fox News Channel "Fox News Live" interview
May 19, 2002	CNN "Breaking News" interview
May 13, 2002	MSNBC "Region in Conflict" guest appearance
May 13, 2002	<i>Cleveland Plain Dealer</i> interview
May 12, 2002	CSPAN interview
May 11, 2002	WKYC "Channel 3 News" interview
May 10, 2002	WKYC "Channel 3 News" interview
May 10, 2002	Met and spoke with reporters at National Press Club in Washington D.C. to discuss Yasser Arafat
May 9, 2002	MSNBC "Hardball with Chris Matthews" guest appearance
May 9, 2002	CNN "Live on Location" interview
May 9, 2002	CSPAN interview
May 9, 2002	Held news conference in Washington D.C.
May 9, 2002	National Press Club speaker
May 8, 2002	MSNBC "Hardball with Chris Matthews" guest appearance
May 8, 2002	CNN "Wolf Blitzer Reports" guest appearance
May 7, 2002	ABC News "Nightline" guest appearance
May 6, 2002	Fox News Channel "Hannity & Colmes" guest appearance
May 4, 2002	Channel 9, Washington D.C. "America's Black Forum" guest appearance
May 3, 2002	Fox News Channel "On The Record with Great Van Susteren" guest appearance
May 2, 2002	CNN "Live On Location" interview
May 2, 2002	CNN "Q&A with Jim Clancy" guest appearance
May 2, 2002	CNN "Crossfire" guest appearance
May 2, 2002	Fox News Channel "Fox News Live" interview
May 1, 2002	CNN "Paula Zahn" guest appearance
May 1, 2002	MSNBC "Hardball with Chris Matthews" appearance
April 30, 2002	Held a breakfast meeting with reporters in Washington D.C
April 30, 2002	MSNBC "Region in Conflict" studio interview
April 29, 2002	MSNBC "Alan Keyes is Making Sense" guest appearance
April 27, 2002	CNN "Saturday CNN" guest appearance
April 26, 2002	MSNBC "Hardball with Chris Matthews" guest appearance

April 25, 2002	MSNBC "America at War" studio interview
April 22, 2002	Fox News Channel "Fox News Live" studio interview
April 20, 2002	Cable News Channel 8 Washington, D.C. "Weekend Late Night" interview
April 18, 2002	CNN "Inside Politics" guest appearance
April 17, 2002	Panelist at the Center for Contemporary Arab Studies (CCAS) at Georgetown University, in Washington D.C.
April 16, 2002	CNBC "Hardball with Chris Matthews" guest appearance
April 16, 2002	Fox News Channel "Hannity and Colmes" guest appearance
April 16, 2002	Associated Press in Washington D.C. interview
April 16, 2002	CNN "Q&A with Jim Clancy" guest appearance
April 15, 2002	Fox News Channel "On the Record with Greta van Susteren" guest appearance
April 15, 2002	CNN "Moneyline" guest appearance
April 15, 2002	NBC "Today" guest appearance
April 14, 2002	CNN "Larry King Weekend" studio guest
April 14, 2002	CNN "Breaking News" interview
April 14, 2002	NBC "Morning News" interview
April 14, 2002	Associated Press in Washington D.C. interview
April 13, 2002	CNN "Breaking News" interview
April 12, 2002	CNN "CNN: Wolf Blitzer Reports" interview
April 11, 2002	Fox News Channel "On the Record with Greta van Susteren" guest appearance
April 11, 2002	NBC "Today" guest appearance
April 10, 2002	CNN "Live Event" interview
April 9, 2002	MSNBC "Alan Keyes is Making Sense" studio guest
April 8, 2002	Fox "Big Story" guest appearance
April 7, 2002	NBC "Meet the Press" guest appearance
April 7, 2002	CNN "Sunday News" interview
April 6, 2002	CNN "Saturday Morning News" appearance
April 4, 2002	CNN "CNN: Wolf Blitzer Reports" guest appearance
April 4, 2002	U.S. Institute of Peace briefing and speech
April 4, 2002	MSNBC "MSNBC News" appearance
April 4, 2002	CNN "Insight" interview
April 4, 2002	CSPAN appearance
April 3, 2002	CNN "Daybreak" appearance
April 3, 2002	Fox News Channel "On the Record" appearance
April 2, 2002	CNN "Crossfire" guest appearance
April 1, 2002	NBC "Today" interview
March 31, 2002	CNN appearance
March 31, 2002	NBC "Nightly News" appearance
March 31, 2002	ABC "This Week" guest appearance
March 29, 2002	PBS "News Hour with Jim Lehrer" guest appearance
March 29, 2002	CNN "Larry King Live" appearance
March 28, 2002	CNN "Q&A with Jim Clancy" guest appearance

March 28, 2002	Fox News Channel "On the Record with Greta van Susternen" guest appearance
March 28, 2002	MSNBC "America at War" guest appearance
March 27, 2002	NPR "Talk of the Nation" guest appearance
March 25, 2002	CNN "Crossfire" appearance
March 22, 2002	CNBC "The News with Brian Williams" guest appearance
March 21, 2002	CNBC "Hardball with Chris Matthews" guest appearance
March 21, 2002	CNN "Moneyline" appearance
March 21, 2002	Fox News Channel "O'Reilly Factor" guest appearance
March 19, 2002	CNN "Moneyline" guest appearance
March 18, 2002	CNBC "Hardball with Chris Matthews" guest appearance
March 13, 2002	MSNBC appearance
March 12, 2002	CNN appearance
March 12, 2002	MSNBC appearance
March 7, 2002	MSNBC "Hardball with Chris Matthews" guest appearance
March 4, 2002	CNN "Hardball with Chris Matthews" guest appearance
March 3, 2002	MSNBC "Hardball with Chris Matthews" guest appearance
February 27, 2002	MSNBC "Hardball" guest appearance
February 26, 2002	MSNBC guest appearance
February 25, 2002	MSNBC guest appearance
February 22, 2002	CNBC "Hardball with Chris Matthews" guest appearance
February 19, 2002	CNBC "Hardball with Chris Matthews" guest appearance
February 14, 2002	CNBC "Hardball with Chris Matthews" guest appearance
February 8, 2002	CNN "Daybreak" guest appearance
February 7, 2002	CNN "Crossfire" guest appearance
February 7, 2002	CNN "Wolf Blitzer Reports" guest appearance
February 3 2002	CNN "Sunday Night News: guest appearance
January 29, 2002	CNN "Q&A: guest appearance
January 25, 2002	CNN "Crossfire" guest appearance
December 9, 2001	CNN "Wolf Blitzer" guest appearance
December 4, 2001	Fox "O'Reilley Factor" guest appearance
December 3, 2001	CNN "Larry King Live" guest appearance
December 2, 2001	CNN "Sunday News" interview
December 1, 2001	CNN "Breaking News" guest appearance
September 15, 2001	Panelist in a discussion on nationalist organizations at the University of New Mexico in Albuquerque, NM.
September 06, 2001	Associated Press in Washington D.C. interview
June 7, 2001	CNN "Live Today" guest appearance
May 18, 2001	Israel Policy Forum Discussion, The Israel Policy Forum (Washington) guest appearance
February 19, 2001	CNN "International Insight" guest appearance
November 9, 2000	Interview in Washington with Associated Press
October 20, 2000	PBS "Newshour with Jim Lehrer" guest appearance
October 17, 2000	CNN "Today" and "Early Edition" guest appearances
October 15, 2000	CNN "Sunday Morning" guest appearance
October 14, 2000	CNN "Worldview" guest appearance

October 12, 2000	PBS "Newshour with Jim Lehrer" guest appearance
July 19, 2000	<i>Washington Post</i> interview from Camp David
December 09, 1998	<i>USA Today</i> interview
October 23, 1998	Associated Press interview
October 14, 1998	NPR "All Things Considered" guest appearance
May 5, 1998	PBS "Newshour with Jim Lehrer" guest appearance

19. The Nexis transcripts reflecting Hassan Abdel Rahman's above-listed activities are attached hereto as Exhibit 13.

20. A search of Nexis shows that between January 1998-January 2004 Nasser Al-Kidwa appeared in the following media broadcasts:

<u>Date</u>	<u>Event</u>
December 1, 2003	CNN guest appearance
October 26, 2003	CNN "Live Sunday" interview
September 19, 2003	CNN guest appearance
June 14, 2003	CNN "People in the News" interview
June 14, 2003	WBAC-TV Baltimore interview
June 13, 2003	KFMB-TV (San Diego) interview
June 8, 2003	WNBC-TV "News Forum" guest appearance
June 6, 2003	CNN "Diplomatic License" guest appearance
June 5, 2003	CNN "Q&A with Jim Clancy" guest appearance
June 2, 2003	CNBC guest appearance
March 24, 2003	CNN "Late Edition" guest interview
November 24, 2002	CNN "Late Edition" guest appearance
October 8, 2002	FOX News "Your World with Neil Cavuto" guest appearance
August 2, 2002	WWL-TV (New Orleans, Louisiana) interview
July 27, 2002	CNN "World News" interview
July 1, 2002	CBS News interview
June 30, 2002	NBC News "Meet the Press" guest appearance
June 29, 2002	CNN interview
May 4, 2002	CNN "Diplomatic License" interview
May 2, 2002	WJRT-TV (Michigan) interview
May 1, 2002	WKRN-TV (Nashville, Tennessee) interview
April 25, 2002	CNN "Live Today" interview
April 24, 2002	CNN "Daybreak" interview
April 24, 2002	WWL-TV (New Orleans, Louisiana) interview
April 24, 2002	WBAL-TV (Baltimore, Maryland) interview
April 24, 2002	KTVT-TV (Texas) interview
April 23, 2002	WWL-TV interview

April 22, 2002	CNN "Live Today" interview
April 21, 2002	WXYZ-TV (Michigan) interview
April 15, 2002	CNN "American Morning" guest appearance
April 15, 2002	WMAQ NBC interview
April 14, 2002	NBC "Meet the Press" guest appearance
April 13, 2002	CNN "Wolf Blitzer Reports" guest appearance
April 13, 2002	CNN "People in the News" interview
April 12, 2002	CNN "American Morning" guest appearance
April 11, 2002	CNN-FN guest appearance
April 8, 2002	CNN "American Morning" guest appearance
April 5, 2002	CNBC "Hardball" guest appearance
April 4, 2002	CNN "Live" guest appearance
April 3, 2002	CNN "American Morning" guest appearance
April 2, 2002	CNN "Wolf Blitzer Reports" guest appearance
March 31, 2002	CNN "Live" guest appearance
March 21, 2002	CNBC "Hardball" guest appearance
March 21, 2002	MSNBC "Hardball" guest appearance
March 18, 2002	MSNBC "News" guest appearance
March 16, 2002	CNN "Diplomatic License" guest appearance
March 12, 2002	MSNBC "Hardball" guest appearance
March 8, 2002	CNN "Wolf Blitzer Reports" guest appearance
January 8, 2002	CNN "Q&A with Jim Clancy" guest appearance
November 25, 2001	CNN "Late Edition" guest appearance
September 7, 2001	CNN "Live at Daybreak" interview
September 6, 2001	CNN News interview
August 27, 2001	PBS "Newshour" interview
August 20, 2001	Fox News interview
June 4, 2001	PBS "Charlie Rose Show" guest appearance
April 21, 2001	CBS News interview
April 21, 2001	CBS "Early Show" guest appearance
March 28, 2001	CNN "Headline News" interview
February 15, 2001	PBS "Charlie Rose Show" studio interview
January 14, 2001	WNBC-TV "News Forum" guest appearance
January 12, 2001	Texas Cable News interview
January 11, 2001	WNBC-TV studio interview
January 7, 2001	CNN "Worldview" studio interview
January 2, 2001	PBS "Charlie Rose Show" studio interview
December 19, 2000	WDAF-TV (Kansas City) interview
November 4, 2000	CNN "Worldview" guest appearance
October 19, 2000	WTTG "Morning News" Washington, DC interview
October 18, 2000	Northeast Cable interview
October 16, 2000	CNN interview
October 15, 2000	CNN "Worldview" guest appearance
October 13, 2000	Fox News Live interview
October 12, 2000	MSNBC News interview
October 12, 2000	CNN "Breaking News" guest appearance

21. The Nexis transcripts reflecting Nasser Al-Kidwa's above-listed activities are attached hereto as Exhibit 14.

22. Exhibit N to Plaintiffs' Memo is the transcript of the deposition of Said M. Hamad taken in *Knox v. PLO*, Civ. No 03-4466 (S.D.N.Y.) on June 8, 2004.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

May 28, 2010

/s/ David J. Strachman
David J. Strachman